

State of Wisconsin
Government Accountability Board

Joel Gratz, Executive Director
Assembly Democratic Campaign Committee,
Complainant,

Against

Russell Goodwin,
Respondent.

VERIFIED COMPLAINT

I, Joel Gratz, based on information and belief, hereby allege as follows:

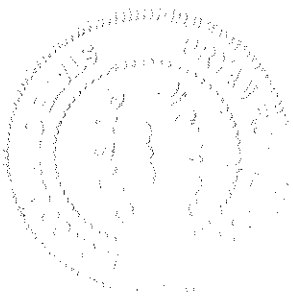
1. This Complaint is brought against Russell Goodwin pursuant to Wisconsin Statutes 8.15(3) and GAB 2.07, Wisconsin Administrative Code.
2. I am a qualified elector in and resident of the State of Wisconsin. I am the Executive Director of the Assembly Democratic Campaign Committee with offices at 15 N. Pinckney Street, Suite 200, Madison, WI 53703.
3. Respondent is Russell Goodwin, GAB File Number 105520. Respondent maintains an address at 2153 South Kinnickinnic Avenue, Milwaukee, WI 53207.
4. On or about June 2, 2014, Respondent filed nomination papers with the Government Accountability Board (GAB) to be placed on the November 4, 2014 ballot for State Representative in the 12th Assembly District. The Respondent's nomination papers contained approximately 306 valid signatures as determined by initial review of GAB staff.
5. Respondent's nomination papers contained a total of 153 signatures with insufficiencies pursuant to GAB Chapters 2.05 and 2.07, Wisconsin Administrative Code, bringing the total number of valid signatures substantially below the threshold of 200 signatures required to be placed on the ballot for State Assembly.
6. A copy of the insufficient signatures is attached hereto and incorporated herein as Exhibit "A". These signatures listed in Exhibit "A" are from outside Assembly District 12. The proper Assembly District of each signer is provided.
7. To be valid nomination signatures, a signer of the nomination papers for the office of State Representative, a state office, must reside in the jurisdiction or district which the candidate names on the paper will represent if elected. Wisconsin Statutes 8.15(3).
8. Addresses from Respondent's nomination papers were checked using the "Who Represents Me?" search engine available on the Wisconsin Legislature's website and

accessible to the public at the following internet address:
<http://legis.wisconsin.gov/pages/waml.aspx>

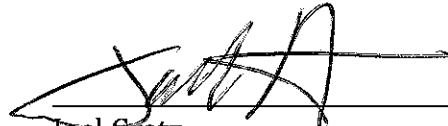
9. Complainant respectfully submits that these facts warrant the Board's attention and the Board should take prompt action to eliminate from the nomination papers filed by Respondent all signatures that are insufficient pursuant to GAB Chapters 2.05 and 2.07, Wisconsin Administrative Code.
10. Complainant reserves the right to amend this complaint with additional information.

I, Joel Gratz, being dually sworn upon oath, state that I personally read the above complaint and that the above listed allegations are true and correct based upon my personal knowledge and my review of the nomination papers and other public records, and as to those allegations stated on my information and believe, I believe them to be true.

Dated this 4th day of June, 2014.

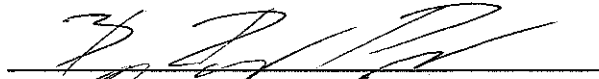


Respectfully submitted,


Joel Gratz

Subscribed and sworn to before me

this 4th day of June, 2014.


(signature of person authorized to administer oaths)

My commission expires 1/3/2016 or is permanent ☐
Notary Public ☒, or _____

CERTIFICATE OF SERVICE

I, Joel Gratz, hereby certify that on this ____ day of June, 2014, a true and correct copy of this complaint was forwarded via electronic email to the email address on file with GAB for Respondent Russell Goodwin.


Joel Gratz

Exhibit A
Insufficient Signatures

Page	Line #	First Name	Last Name	Proper Assembly District
1	4	Linda	Jackowitz	11
1	5	Mya	Bass	11
1	7	Kev	Yang	11
1	8	Steve	Allyn	12
1	9	Bernard	Jackson	22
1	10	Eric	Barbsdahl	11
2	1	Lester	William	11
2	2	Marcus	Brooks	11
2	3	Devona	Jones	11
2	4	Andre	Brooks	11
2	5	Evelyn	Lopez	19
2	6	Devona	Jones	11
2	7	Armando	Diaz	11
2	8	Jenifer	McBride	11
2	9	Craig	Burt	11
2	10	Trumaine	Ellis	11
3	4	Venis	Cox	8
3	5	Al	Mclver	17
4	1	Ricco	Perez	11
4	2	Ethelean	Loney	18
4	3	Curtis	Davis	11
4	4	Dominique	Lone	11
4	5	Charlotte	Edwards	11
4	6	Jibrul	Cunningham	11
4	8	Landon	Cunningham	11
4	9	Javontay	Scott	11
5	1	Tremell	Griggs	11
5	3	Terrance	Baker	11
5	4	Kwesa	Sanders	11
5	5	Shaquisha	Jones	11
5	6	Destiny	Mitchell	10
5	7	Kevin	Milton	11
5	8	Joe	Bray	11
6	1	Joe	Hinojosa	11
6	2	Dave	Winier	11
6	3	Kevin	Cartwright	11
6	4	Lavana	Neal	11
6	6	Angel	Perry	17
6	9	Jessica	Erickson	11

6	10	Rosalind	Pugh	11
7	3	Lorenzo	Galloway	17
7	4	Elijah	Willis	11
7	5	Zeinobia	Mathis	10
7	7	Carl	Covington	19
7	10	Khiry	Wade	12
8	3	Marlona	Moar	7
8	4	Ebony	CT	7
8	5	Amanda	Williams	22
8	7	Anita	Norwood	10
8	10	Kalais	Robinson	11
9	1	Sher	Thao	17
9	3	DaPorsha	Turner	11
9	5	Nona	Campbell	11
9	6	Devante	White	11
9	7	Ayesha	Lang	11
10	1	Michelle	Williams	11
10	2	Gor	Mona	11
10	4	Kimberly	Quin	11
10	5	Willie	Washington	11
10	10	Carter	Bigger	11
11	1	Ryan	Milbrath	22
11	4	John	Ricekhoff	11
11	6	Shantell	Toreman	22
11	7	Robert	Moore	14
11	9	Mai	Her	11
12	6	Nijah	Newsom	16
12	7	Shasha	Sellers	18
12	8	Lynette	Johnson	10
12	9	Tynesha	Crawford	11
12	10	Deniko	Crawford	10
13	6	Casandra	Lane	12
14	3	Brian	Lee	16
14	4	Cynthia	Roberson	17
14	7	Alan	McSely	12
15	1	Channel	Malone	11
15	2	Crystal	Malone	11
15	3	Princess	Malone	11
15	8	Karen	Kane	17
16	1	Charles	Grady	22
16	2	Dorothy	Jackson	22
16	4	Willie	Watson	9
16	6	Francis	Behl	22
16	10	Crystal	Davis	17

17	1	Suzanne	Wells	11
17	4	Andre	Perry Sr.	11
17	5	Samaria	Perry	11
17	9	Ebony Scott	Jackson	22
17	10	Jenette	Johnson	16
18	1	Marcia	Johnson	11
18	6	LaNeica	Adams	11
22	8	Chantrell	Thomas	16
22	9	Kanesha	Thomas	10
23	4	Jackie	Kyles	17
23	5	Whitney	Anderson	22
23	6	Anthony	Orr	10
23	7	Myisha	Gilmore	11
23	8	Gina	Johnson	11
23	9	Robert	Key	11
24	1	Yvonne	Ford	11
24	2	Sharon	Amey	16
24	5	Michelle	Francis	11
24	6	Lorrell	Poller-May	11
24	9	Jarvin	Chandler	18
24	10	Mary	Robinson	17
26	1	Stacia	Reed	11
26	2	Elcid	Anthony	11
26	7	John	Smith	11
26	8	Natasha	Pope	11
26	9	Jason	Graham	11
26	10	Willie	Bayler	11
27	1	Kieva	Johnson	22
27	4	Terrance	King	17
27	5	Sherry	Hill	17
27	6	Delona	Mayfield	11
27	7	Lashonda	Wallace	11
27	8	Carl	Davis	11
27	9	Brianna	Taylor	10
27	10	Sharita	Pope	11
28	2	Anthony	Petty	11
28	3	Johnny	Davis	11
28	4	Ekalah	Findley	11
28	7	Mariano	Evans	10
29	1	Jacolby	Spicer	11
29	4	Terry	Love	22
29	5	Yvette	Rutledge	11
29	6	Chester	Cole	11
29	8	Thaddeus	Hannah	11

29	9	Diane	Johnson	11
30	1	Newlee	Jones	11
30	2	Carlos	Ward	11
30	4	DeArion	Kentle	11
30	8	Eric	Smith	11
30	10	Roshanta	Hudson	11
31	1	Nathaniel	Smith	11
31	2	Jacqueline	Yahnke	11
31	5	Janice	Bond	11
31	9	Tasha	King	11
32	3	Linda	Thomas	11
32	8	Qiana	Carrington	11
32	9	Leslie	Sotillo	11
32	10	Kevin	Sotillo	11
33	2	Anito	Henry	11
33	3	Rashawn	Mccollum	11
33	4	Jenifer	Patterson	17
33	6	Makisha	Traylor	11
33	7	Lillian	Lewis	11
33	9	Sharday	Clark	17
33	10	Sherrell	Taylor	8
34	1	Doris	Hope	11
34	2	Cassandra	Young	11
34	5	Maggie	Doss	11
34	6	Markquesa	Alexander	11
34	8	Gary	Mitchell	84